UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	K	<u> </u>
IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION		21MC102(AKH)
BEATRIZ CASTILLO,		07CV11020(AKH)
	Plaintiff(s),	NOTICE OF ADOPTION BY BLUE MILLENNIUM
-against-		REALTY LLC OF ANSWER TO MASTER COMPLAINT
80 LAFAYETTE ASSOCIATES LLC, e	t al.,	10 WASTER COMPLAINT

PLEASE TAKE NOTICE that defendant BLUE MILLENNIUM REALTY LLC (hereinafter "Blue Millennium") as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Blue Millennium's Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). BLUE MILLENNIUM has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

Defendants.

**PLEASE TAKE FURTHER NOTICE THAT** defendant, Blue Millennium reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 ( $\P$  D(1)-(5)).

**WHEREFORE**, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York April 22, 2008

## HARRIS BEACH PLLC

Attorneys for Defendant
BLUE MILLENNIUM REALTY LLC

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Liaison Counsel for the Defendants

All Counsel via ECF

## **CERTIFICATION AS TO SERVICE**

The undersigned certifies that on April 22, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

Dated: April 22, 2008

\frac{/s/}{Stanley Goos, Esq. (SG 7062)}